

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

AMERICAN EXPRESS FINANCIAL  
ADVISORS INC.,

Plaintiff,

v.

MARY R. DeGON and  
MATTHEW M. BRUCE,

Defendants.

Civil Action No. \_\_\_\_\_

04-10979 RGS

**MOTION FOR ADMISSION**

**OF TODD W. SCHNELL *PRO HAC VICE***

Pursuant to Local Rule 83.5.3(b), the plaintiff American Express Financial Advisors, Inc., and the undersigned counsel hereby move for the admission *pro hac vice* of Todd W. Schnell of Dorsey & Whitney, LLP, 50 South Sixth Street, Suite 1500, Minneapolis, Minnesota, 55402, to appear in this action on behalf of the plaintiff. In support of this Motion, the Affidavit of Todd W. Schnell is filed concurrently herewith. Further, the plaintiff has retained the undersigned local counsel, Scibelli and Whiteley, LLP, 45 School Street, 3<sup>rd</sup> Floor, Boston, MA 02108, to concurrently appear in this action and assist as necessary.

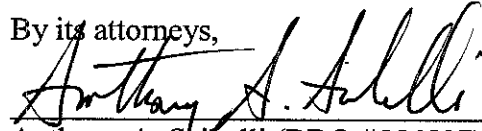
WHEREFORE, the movants respectfully request that the Court admit Todd W. Schnell as counsel *pro hac vice* in the above-captioned matter.

**LOCAL RULE 7.1 CERTIFICATE**

The undersigned counsel was unable to confer with opposing counsel on the subject of this motion as no counsel has yet to enter an appearance for the defendants.

Respectfully submitted,  
AMERICAN EXPRESS FINANCIAL  
ADVISORS, INC.

By its attorneys,

A handwritten signature in black ink, appearing to read "Anthony A. Scibelli", is written over a horizontal line.

Anthony A. Scibelli (BBO #556507)  
Brian E. Whiteley (BBO #555683)  
Scibelli and Whiteley, LLP  
Old City Hall  
45 School Street, 3rd Floor  
Boston, MA 02108  
(617) 227-5725

Of Counsel pending above Motion for  
Admission:

Todd W. Schnell (MN No. 252256)  
DORSEY & WHITNEY, LLP  
50 South Sixth Street, Suite 1500  
Minneapolis, Minnesota 55402

Dated: May 14, 2004